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**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

VALERIE BROOKS, individually and on behalf of all others similarly situated,

**Plaintiff.**

V.

REDA BELLARBI AND ASSOCIATES,  
INC. d/b/a BRASSERIE CAPITALE, a  
California corporation; and DOES 1 to 10,  
inclusive.

## Defendants

Case No.: 2:20-cv-02074-DAD-DB

## CLASS ACTION

*Assigned to District Judge Dale A. Drozd*

**JOINT STIPULATION TO DISMISS CASE  
WITH PREJUDICE PURSUANT TO F.R.C.P.  
RULE 41(A); [PROPOSED] ORDER**

FAC Filed: March 2, 2021  
Trial Date: None Set

1 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Valerie  
2 Brooks and Defendant Reda Bellarbi and Associates, Inc. d/b/a Brasserie Capitale, stipulate and  
3 jointly request that this Court enter a dismissal with prejudice as to Plaintiff's individual claims  
4 in their entirety and without prejudice as to the claims of absent putative class members in the  
5 above-entitled action. Each party shall bear her or its own fees and costs.  
6

7 Dated: August 25, 2022

**WILSHIRE LAW FIRM, PLC**

8 /s/ Binyamin I. Manoucheri, Esq.

9 Thiago M. Coelho, Esq.  
10 Binyamin I. Manoucheri, Esq.  
11 *Attorneys for Plaintiff and  
Proposed Class*

12 Dated: August 25, 2022

**WEINTRAUB TOBIN CHEDIAK COLEMAN  
GRODIN**

14 /s/ Lukas J. Clary

15 Lukas J. Clary, Esq.  
16 *Attorneys for Defendant*

17 **SIGNATURE ATTESTATION**

18 I hereby attest that all signatories listed above, on whose behalf this joint stipulation is  
19 submitted, concur in the filing's content and have authorized the filing.

20 Dated: August 25, 2022

**WILSHIRE LAW FIRM, PLC**

21 A/s/ Binyamin I. Manoucheri  
22 Binyamin I. Manoucheri  
23 *Attorneys for Plaintiff and  
Proposed Class*